Exhibit J Affidavit of Nurse Linda Stewart

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA EASTERN DIVISION

JEFFERY B. SANFORD,)
Plaintiff,))
v.)Civil Action No. 3:06-cv-00327-MHT-DRB
JAY JONES, et al.)
Defendants.)
<u>AFFIDAV</u>	IT OF NURSE LINDA STEWART
STATE OF ALABAMA)
COUNTY OF LEE))

BEFORE ME, the undersigned authority and Notary Public in and for said County and State at large, personally appeared Linda Stewart, who being known to me and being by me first duly sworn on oath deposes and says as follows:

- 1. My name is Linda Stewart. I am over the age of nineteen and competent to execute this affidavit.
- 2. I have been employed as a nurse with the Lee County Detention Facility for over five years. I am a Licensed Practical Nurse (L.P.N.) and have been licensed for over twenty-years, having served as a nurse in the ICU and CCU in Cobb Hospital Emergency Room for fifteen-years. I taught Nursing Assistance Clinicals for two

years at Career Institute. I collected medical information for the law firm of Bellamy and Jones for three years, and I was employed as the personal nurse for Doctor Hoffman, in Phenix City, Alabama, for twelve years, prior to my coming to the Lee County Detention Facility.

- 3. I am familiar with the Plaintiff Jeffery B. Sanford due to his incarceration in the Lee County Detention Facility.
- 4. I state affirmatively that I neither acted, nor caused anyone to act, in such a manner as to deprive the Plaintiff of any right to which he was entitled.
- 5. I have complied with all policies and procedures of the Lee County Detention Facility. I am not aware of nor have I authorized or allowed any deviation from said policies and procedures.
- 6. All medical records attached to the Special Report are true and accurate copies of medical documents kept in the Plaintiff's medical file by me in the ordinary course of my business. I am the custodian of these records.

7. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit and that the above statements were made by drawing from my personal knowledge of the situation

SWORN TO and **SUBSCRIBED** before me this \(\) day of August, 2006.

My Commission Expires: